

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

JENAM TECH, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-00271-ADA

JURY TRIAL DEMANDED

PATENT CASE

**JOINT MOTION TO TRANSFER CASE TO THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Pursuant to Paragraph 9 of the Joint Stipulation to Stay All Deadlines (ECF No. 32), Plaintiff Jenam Tech, LLC (“Jenam”) and Defendant Google LLC (“Google”) hereby jointly move to transfer the above-captioned action to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1404(a).

The Joint Motion is based on the following facts:

1. On June 1, 2020, Jenam filed a patent infringement action in the Western District of Texas, styled *Jenam Tech, LLC v. Google LLC*, Case No. 6:20-cv-00453-ADA (“*Jenam I*”).
2. On March 17, 2021, Jenam filed a second patent infringement action in the Western District of Texas: the above-captioned case, *Jenam Tech, LLC v. Google LLC*, Case No. 6:21-cv-00271-ADA (“*Jenam II*”).
3. Both *Jenam I* and *Jenam II* involve the same parties and related patents. The Parties agree that the cases should ultimately be consolidated given the substantial overlap between the two cases.

4. On October 7, 2021, the Court transferred *Jenam I* to the Northern District of California (*Jenam I*, ECF No. 104), pursuant to the Federal Circuit's Order on Petition for Writ of Mandamus in *In re: Google LLC*, Case No. 21-171, ECF No. 15 (*Jenam I*, ECF No. 103). The Federal Circuit's Order on Petition for Writ of Mandamus is attached as **Exhibit A** to this Joint Motion.

5. On October 12, 2021, the Parties filed a Joint Stipulation to Stay All Deadlines pending resolution of Jenam's request for panel / *en banc* rehearing of the Federal Circuit's Order on Petition for Writ of Mandamus. ECF No. 32. In Paragraph 9 of that stipulation, the Parties stated in relevant part:

[I]f the Federal Circuit ultimately upholds its order granting Google's petition for writ of mandamus and *Jenam I* remains in the Northern District of California, the Parties agree that the above-captioned case, *Jenam II*, should also be transferred to the Northern District of California pursuant to 28 U.S.C. § 1404(a) for the same reasons as articulated by the Federal Circuit in *In re: Google LLC*, Case No. 21-171. The Parties will submit a joint stipulation agreeing that this case should be transferred to the Northern District of California for the convenience of parties and witnesses, to promote judicial efficiency, and in the interest of justice. The Parties also agree that the motion to transfer briefing in the *Jenam I* litigation is applicable to the *Jenam II* litigation, given the substantial overlap between the two cases.

6. On October 21, 2021, the Court granted the Joint Stipulation to Stay All Deadlines pending resolution of Jenam's request for panel / *en banc* rehearing of the Federal Circuit's Order on Petition for Writ of Mandamus.

7. On November 23, 2021, the Federal Circuit denied Jenam's petition for panel / *en banc* rehearing of the Federal Circuit's Order on Petition for Writ of Mandamus. The Federal Circuit's Order on Petition for Rehearing *En Banc* is attached as **Exhibit B** to this Joint Motion. *See also Jenam I*, ECF No. 105.

8. Because the Federal Circuit denied Jenam’s petition for panel / *en banc* rehearing in the *Jenam I* case, the Parties agree—in accordance with Paragraph 9 of the Joint Stipulation filed on October 12, 2021—that the above-captioned case, *Jenam II*, should be transferred to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1404(a) for the same reasons as articulated by the Federal Circuit’s Order on Petition for Writ of Mandamus in *In re: Google LLC*, Case No. 21-171, ECF No. 15. The Parties further agree that the above-captioned case should be transferred to the Northern District of California for the convenience of the parties and witnesses, to promote judicial efficiency, and in the interest of justice. The Parties also agree that the motion to transfer briefing in the *Jenam I* litigation is applicable to the *Jenam II* litigation, given the substantial overlap between the two cases.

9. Counsel for the Parties have met and conferred in good faith and all Parties agree to the relief sought in this Joint Motion.

WHEREFORE, Plaintiff Jenam Tech, LLC and Defendant Google LLC respectfully request that the Court transfer the above-captioned action to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1404(a).

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Respectfully submitted,

Dated: November 30, 2021

KEKER, VAN NEST & PETERS LLP

*/s/ Matthew M. Werdegar, with permission by*  
By: *Michael E. Jones*

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Dated: November 30, 2021

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies counsel for Plaintiffs and Defendants complied with the meet and confer requirement in Local Rule CV-7(i). This motion is being filed jointly by the parties.

*/s/ Matthew M. Werdegarr, with*  
*permission by Michael E. Jones*  
Michael E. Jones